

NATALIE K. WIGHT, OSB #035576

United States Attorney

District of Oregon

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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 3:23-cv-01360-MO

v.

**\$187,182.67 IN UNITED STATES
CURRENCY, *in rem*,**

**COMPLAINT *IN REM* FOR
FORFEITURE**

Defendant.

Plaintiff, United States of America, by Natalie K. Wight, United States Attorney for the District of Oregon, and Julia E. Jarrett, Assistant United States Attorney, for its Complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 18 U.S.C. § 981; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendant, *in rem*, \$187,182.67 in U.S. currency, converted cryptocurrency obtained from SHAISHAV RAMAVAT's OKX Exchange Account # 301953210925592576, is subject to forfeiture in the District of Oregon, and is now and during the pendency of this action will be within the jurisdiction of this Court.

COUNT 1

III.

Defendant, *in rem*, \$187,182.67 in U.S. currency, constitutes, or is derived from, proceeds obtained, directly or indirectly, from a violation of 18 U.S.C. § 1343 (wire fraud), and is forfeitable to the United States pursuant to the provisions of 18 U.S.C. § 981(a)(1)(C), as more particularly set forth in the Declaration of Special Agent Guy Gino, Homeland Security Investigations, marked as Exhibit A, attached and fully incorporated herein by this reference.

COUNT 2

IV.

Defendant, *in rem*, \$187,182.67 in U.S. currency, was involved in transactions or attempted transactions or traceable to money laundering offenses in violation of 18 U.S.C. § 1956(a)(1)(B)(i) (concealment money laundering) and 18 U.S.C. § 1957 (unlawful monetary transactions in excess of \$10,000), and is forfeitable to the United States pursuant to the provisions of 18 U.S.C. § 981(a)(1)(A), as more particularly set forth in the Declaration of SA Gino, marked as Exhibit A,

attached and fully incorporated herein by this reference.

WHEREFORE, Plaintiff, United States of America, prays that due process issue to enforce the forfeiture of Defendant, *in rem*, \$187,182.67 in U.S. currency; that due notice be given to all interested persons to appear and show cause why forfeiture of this Defendant currency, *in rem*, should not be decreed; that due proceedings be had thereon; that this Defendant be forfeited to the United States; that the Plaintiff United States of America be awarded its costs and disbursements incurred in this.

Dated: September 19, 2023.

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Julia E. Jarrett
JULIA E. JARRETT
Assistant United States Attorney

VERIFICATION

I, GUY GINO declare, under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with Homeland Security Investigations and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

/s/ Guy Gino
GUY GINO
Special Agent
Homeland Security Investigations